

Kevin R. Anderson (4786)  
Jocelyn J. Rick (9508)  
Kellie K. Nielsen (11416)  
OFFICE OF THE CHAPTER 13 TRUSTEE  
405 South Main Street, Suite 600  
Salt Lake City, Utah 84111  
Telephone: (801) 596-2884  
Facsimile: (801) 596-2898  
Email: kratrusteemail@ch13kra.com

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH  
CENTRAL DIVISION**

IN RE: RONALD F. BAILEY MARY LYNN BAILEY  Debtors	CASE NO: 10-32980  Chapter 13  JUDGE WILLIAM T. THURMAN
---	---

**TRUSTEE'S CONTINUING OBJECTION TO CONFIRMATION**

KEVIN R. ANDERSON, Chapter 13 Trustee, hereby objects to confirmation based on the following unresolved issues:

1. The Debtors have not resolved all issues raised in the Trustee's initial objection to confirmation.

The unresolved issues are set forth in paragraph(s) 6 of the Trustee's initial objection.

2. The following creditor objection(s) remain unresolved: Construction Capital and US Bank.

3. The Trustee's objection to an exemption claimed on Schedule C remains unresolved. The Trustee requests a ruling from the court on this issue.

4. The plan is defective in the following respects: the distribution on claims in classes 6 and 7 has been altered from the Model Plan.

5. The Trustee requests a clearer explanation as to how the Debtors want the Trustee to pay the secured claims in the Plan.

6. The Trustee requests a ruling from the Court regarding the following issue that may have a material impact on the return to nonpriority unsecured creditors: the amended Plan dated April 18, 2011, was not noticed to creditors. The Trustee requests that the Court decide if the Plan needs to be noticed out.

THEREFORE, the Trustee has an ongoing objection to the confirmation

DATED: August 16, 2011

KRA /s/  
Kevin R. Anderson, Esq.  
Standing Chapter 13 Trustee

#### CERTIFICATE OF MAILING

The undersigned hereby certifies that true and correct copy of the foregoing Trustee's Continuing Objection to Confirmation was served upon all persons entitled to receive notice in this case via ECF notification or by U.S. Mail to the following parties on August 16, 2011:

Brian W. Steffensen, 448 East 400 South, Suite 100, Salt Lake City, UT 84111